

**GREATER NORWICH  
LOCAL PLAN  
EXAMINATION MATTER 9  
ISSUE 4: COSTESSEY  
CONTINGENCY SITE**

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**WRITTEN STATEMENT**

**Mrs Janet Skidmore**

**9 February 2022**

**Carter Jonas**

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## 1.0 MATTER 9 ISSUE 4: COSTESSEY CONTINGENCY SITE

### Introduction

- 1.1 This Hearing Statement for Matter 9 Issue 4 has been prepared by Carter Jonas on behalf of Mrs Janet Skidmore to respond to the Inspectors questions relating to the proposed Costessey Contingency Site.
- 1.2 Mrs Skidmore submitted representations to the pre-submission draft Greater Norwich Local Plan (draft GNLP) that address the issues raised in Matter 9 Issue 4. The relevant Id. numbers for those representations are as follows:
  - Delivery Statement - Rep Id. 23498
  - Policy 7.1: The Norwich Urban Area including the Fringe Parishes – Rep Id. 23506
- 1.3 In summary, Mrs Skidmore objected to the proposed contingency site at Costessey because there are a number of unresolved constraints associated with development at the site that make it unsuitable, a substantial amount of work is required before development can be delivered at the site, and it is very unlikely that this site would address a housing delivery issues in the short term. It is considered that multiple contingency sites should be identified, of a variety of sizes and in various locations including Wymondham, to address issues associated with the potential under-delivery of housing.

### Matter 9 Issue 4 – Costessey Contingency Site (Ref GNLP0581/2043)

#### 1. Is the allocation justified and is it supported by the evidence?

- 1.4 No. The assessment of the proposed contingency site in the Sustainability Appraisal identified minor negative impacts for a number of sustainability objectives including air quality and noise, climate change mitigation, and landscape – see Sustainability Appraisal Vol.3 [Doc Ref. A6.3 at Section F4.4]. The Costessey Booklet [Doc Ref. B1.4] seeks to explain the selection process for the proposed contingency site, and refers to the findings of the Housing and Economic Land Availability Assessment (HELAA) for the site. The findings of the HELAA identifies a number of 'amber' scores for the site, including for landscape and transport and access.
- 1.5 The findings of the Stage 6 Assessment in the HELAA for the site provides commentary on some of the constraints [see pg.22 to 24 of Doc Ref. B1.4] and states in part that:

*“There are a number of constraints including overhead power lines, an adjacent contaminated site, landscape impacts, surface water flooding and townscape concerns that would require mitigation for development to be considered acceptable. The entire site is within the Norwich Southern Bypass Protection Zone and the majority is within designated river valley. Development of the site may result in increased traffic on the local road network and the A47, however subject to suitable footpath provision it may be possible to mitigate these issues. A number of constraints are identified but subject to being able to overcome these the site is concluded as suitable for the land availability assessment.”*
- 1.6 The evidence indicates that there are a number of unresolved constraints associated with development at the site. Policy GNLP0581/2043 includes policy requirements to address the main constraints to development at the site, but there is no evidence or confirmation from statutory consultees that the identified constraints can be resolved. The delivery of the proposed contingency

site is not straightforward, and development at the site may not be delivered quickly to address any housing land supply shortfall in the short term.

**2. Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?**

- 1.7 No. As set out above, the site assessments identify a number of constraints to development at the site, but there is no evidence that these constraints have been properly assessed to determine whether they can be addressed satisfactorily. Policy GNLP0581/2043 includes policy requirements to address the main constraints to development at the site, but there is no evidence to demonstrate that the identified mitigation measures would be effective. In addition, there is no information from statutory consultees to confirm that the identified constraints at the site can be resolved by the proposed mitigation measures.

**3. Is the land required in order to deliver a safe and suitable access into the site available?**

- 1.8 No comment.

**4. Has the availability, viability and deliverability of the site been robustly assessed? Would the requirement to provide new educational facilities within the site affect its ability to meet other policy requires, e.g., for affordable housing?**

- 1.9 No comment.

**5. Is the proposed trigger mechanism for the release of this site justified and effective?**

- 1.10 No. It is considered that a single large contingency site in one settlement will not be effective in addressing a housing land supply shortfall in the short term. The implementation of the contingency approach is based on housing monitoring data and is triggered when there are three consecutive years in which housing completions in Greater Norwich are more than 15% below annual targets. The monitoring process occurs on an annual basis, and it is inevitable that there will be a delay before a problem with housing delivery is identified.
- 1.11 Once it has been decided to implement the trigger mechanism for the contingency site there is still a number of task to complete before housing is actually delivered. As set out above, the delivery of the proposed contingency site is not straightforward, and there are a number of constraints that need to be resolved but remain uncertain at this stage. It is noted that there is a policy requirement for a masterplan to be prepared for the proposed contingency site, which identifies a range of issues that need to be resolved for a planning application. It will then take time to complete technical surveys and the design and layout of the proposed contingency site including highway access and transport impacts, discuss and agree the proposed development with statutory consultees, consult with residents, prepare and submit a planning application with a masterplan, submit reserved matters and discharge conditions, market the site to housebuilders, and complete infrastructure.
- 1.12 In these circumstances it is unlikely that housing would be delivered at the proposed contingency site to make a meaningful contribution to the housing land supply in the short term.
- 1.13 As set out in Mrs Skidmore's representations to draft GNLP It is considered that a number of contingency sites should be identified in a variety of locations including at Wymondham, and that the trigger mechanism for the contingency approach is activated earlier than three years. There are no

problems with housing delivery rates at Wymondham, as demonstrated by the existing development to the north of Gonville Hall Farm.

**6. Are the other detailed requirements set out in Policy GNLP0581/2043 justified and effective?**

- 1.14 It appears that the policy requirements are necessary, in order to address the constraints to development at the site. The list of policy requirements demonstrate that the delivery of development at the contingency site is not straightforward, and the complexity of the issues to be resolved would make it an ineffective as a contingency to address the under-delivery of housing in the short term.

**Alternative/Additional Contingency Site at Wymondham – Ref (GNLP0320)**

- 1.15 It is considered that a number of smaller sites including at Wymondham, which could be delivered at the same time by different housebuilders/developers, would be more effective as contingency sites to address the non-delivery of housing and a housing land supply shortfall in the future.
- 1.16 It is requested that land south of Gonville Hall Farm in Wymondham (Ref. GNLP0320) is identified as an additional allocation or a contingency site in Draft GNLP and is reassessed as reasonable alternative site to meet future development needs.
- 1.17 As set out in Mrs Skidmore's representations to Policy 7.2: Main Towns (Rep Id. 23508) and in the Written Statements for Matters 10 and 15, there is no strategy in draft GNLP for additional housing at Wymondham from 2030 to 2038. It is predicted that most of the Wymondham AAP allocations will be completed by 2026, and that all outstanding dwellings from the AAP allocations and the proposed new allocations in Draft GNLP (as Site Refs. GNLP0354R and GNLP3013) will be completed by 2030. The absence of a strategy for Wymondham from 2030 onwards is inappropriate.
- 1.18 As set out in Mrs Skidmore's representation to the Site Allocations in Wymondham (Rep Id. 23511) there are no constraints to development at the land south of Gonville Hall Farm in Wymondham (Site Ref. GNLP0320). It was requested that this site should be identified as a reasonable alternative which is suitable as an additional allocation or contingency site in Draft GNLP.
- 1.19 For all the above reasons, it requested that the proposed contingency site at Costessey is deleted, and replaced by a number of smaller contingency sites to address the under-delivery of housing, including a contingency site at land south of Gonville Hall Farm in Wymondham (Site Ref. GNLP0320).

